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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18 || 3taps, Inc.,

Case No. 18-cv-00855-EMC

19 Plaintiff,

**JUSTICE DECLARATION ISO
DEFENDANT LINKEDIN'S MOTION
TO DISMISS PLAINTIFF'S
AMENDED COMPLAINT**

20 || vs.

21 | LinkedIn Corporation,

22 Defendant.

1 I, Daniel Justice, declare as follows:

2 1. I am an attorney admitted to practice in the State of California and the United
3 States District Court for the Northern District of California, and am counsel of record for
4 LinkedIn Corporation. I have personal knowledge of the matters set forth herein and, if called to
5 testify, could and would testify competently thereto. I submit this declaration in support of
6 LinkedIn's Motion to Dismiss Plaintiff's Amended Complaint.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of a redacted excerpt of
8 HiQ Labs, Inc.'s January 18, 2018 Series C Preferred Stock Purchased Agreement, produced by
9 hiQ Labs, Inc. to LinkedIn Corporation during discovery in *hiQ Labs, Inc. v. LinkedIn Corp.*,
10 3:17-cv-03301-EMC. hiQ de-designated the unredacted portions of this Exhibit and gave express
11 permission to LinkedIn Corporation to use this Exhibit in this litigation.

12 3. Attached hereto as **Exhibit B** is a redline between a true and correct copy of 3taps,
13 Inc.'s Complaint for Declaratory Judgment Against LinkedIn Corporation (Dkt. 1) and a true and
14 correct copy of 3taps, Inc.'s Amended Complaint for Declaratory Judgment Against LinkedIn
15 Corporation (Dkt. 59).

16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct.

18 Executed this seventh day of December, 2021, in San Francisco, CA.

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24 Daniel Justice
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